

MICHAEL D. LONG (CA State Bar #149475)
901 H Street, Suite 301
Sacramento, CA 95814
(916) 201-4188
Mike.Long.Law@msn.com

Attorney for LOUIS STOKES

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

THE UNITED STATES OF AMERICA,) No. 2:24-cr-00031-JAM
Plaintiff,)
) STIPULATION AND ORDER TO CONTINUE
v.) STATUS CONFERENCE AND EXCLUDE
) TIME
LOUIS JAMES STOKES,)
Defendant,) Requested date: 3-25-2025
) Time: 9:00 a.m.
=====) Judge: Hon. John A. Mendez

It is hereby stipulated between the parties, James Conolly, Assistant United States Attorney, and Michael Long, attorney for defendant LOUIS STOKES that the status conference set for February 25, 2025, at 9:00 a.m. should be continued and re-set for March 25, 2025, at 9:00 a.m.

The parties further agree that this court should make a finding of good cause for the requested extension and that in fact good cause is hereby shown. The government has provided discovery to the defense. Mr. Long continues to read, view and listen to the discovery, investigate the case and meet with his client. Mr. Long has requested many additional documents from the government that are necessary to defend Mr. Stokes effectively. The government will provide that discovery to the defense soon. Counsel believes that failure to grant the above-requested continuance would deny counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. Counsel for the United States does not oppose this requested continuance.

All parties are available to appear in this case on March 25, 2025.

Each party further stipulates that the ends of justice served by granting such continuance outweigh the best interests of the public and of all the defendants in a speedy trial. Time has previously been excluded through February 25, 2025.

All parties request the date of March 25, 2025, at 9:00 a.m., for the new status hearing. The request for extending the date for the status conference is at the specific request the defendant and with the knowing, intelligent and voluntary waiver of the defendant's speedy trial rights under the law. Good cause is hereby shown.

For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period from the present date through February 25, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendants' request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

Dated: February 19, 2025

Respectfully submitted,

/s/ Michael D. Long
MICHAEL D. LONG
Attorney for Louis Stokes

Dated: February 19, 2025

MICHELE BECKWITH
Acting United States Attorney

/s/ James Conolly
JAMES CONOLLY
Assistant U.S. Attorney

ORDER

Based on the stipulation of the parties and good cause appearing, the status conference is hereby **RESET** for **March 25, 2025, at 9:00 a.m.**, before District Judge John A. Mendez.

For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period from the present date through March 25, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendants' request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial. Time is hereby excluded through the new hearing date of March 25, 2025.

IT IS SO ORDERED.

Dated: February 19, 2025

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE